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6 **STATE OF CALIFORNIA**, by and through  
**GEORGE GASCÓN**, Los Angeles County  
7 District Attorney, **COUNTY OF LOS ANGELES**  
and **LOS ANGELES COUNTY DEPARTMENT**  
**OF PUBLIC HEALTH ACTING AS THE**  
**LOCAL ENFORCEMENT AGENCY**

9 **UNITED STATES BANKRUPTCY COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **SAN FERNANDO VALLEY DIVISION**

12 In re Case No. 1:21-bk-11781-MT  
13 ANDREA LYNN MURRAY, Chapter 7  
14 Debtor.

15  
16 THE PEOPLE OF THE STATE OF  
17 CALIFORNIA, by and through GEORGE  
18 GASCÓN, Los Angeles County District  
Attorney, COUNTY OF LOS ANGELES and  
19 LOS ANGELES COUNTY DEPARTMENT  
OF PUBLIC HEALTH ACTING AS THE  
LOCAL ENFORCEMENT AGENCY,

20 Plaintiffs,  
21 v.  
22 ANDREA LYNN MURRAY, and DOES 1-  
10;

23 Defendants.

Adv No. 1:22-ap-01010-MT

24 **THIRD STIPULATION FOR ENTRY OF  
ORDER (1) EXTENDING DISCOVERY  
CUT-OFF DATE; AND (2) CONTINUING  
PRE-TRIAL CONFERENCE**

25 Pre-Trial Conference:

Date: November 4, 2024

Time: 11:00 a.m.

Place: Courtroom 302

United States Bankruptcy Court  
21041 Burbank Boulevard  
Woodland Hills, CA 91367

26 [NO HEARING REQUIRED]

**TO THE HONORABLE MAUREEN A. TIGHE, UNITED STATES BANKRUPTCY  
JUDGE AND ALL PARTIES IN INTEREST:**

This *Third Stipulation For Entry of Order* (1) *Extending Discovery Cut-Off; and* (2) *Continuing Pre-Trial Conference* (the “**Third Stipulation**”), is entered into by and between the above-captioned Defendant, Andrea Lynn Murray (the “**Debtor**” or “**Defendant**”) and the Plaintiff, Los Angeles County Department of Public Health Acting as the Local Enforcement Agency (“**Plaintiff**” or “**LEA**”) (collectively, the “**Parties**”), with regard to the following facts and recitals:

## RECITALS

## **The Debtor's Bankruptcy Case**

A. On October 27, 2021, Defendant, Andrea Lynn Murray commenced a chapter 7 bankruptcy case [Docket No. 1].

B. On February 14, 2022, the Defendant's bankruptcy case was closed [Docket No. 30].

## The Adversary Proceeding

C. On October 27, 2021 (the “**Petition Date**”), the Debtor filed a voluntary petition under chapter 7 of Title 11 of the United States Code.

D. On February 4, 2022, the Plaintiff, the People of the State of California (the “*People*”), by and through George Gascón, Los Angeles County District Attorney and the County of Los Angeles (the “*County*”) commenced an adversary proceeding (the “**Adversary Proceeding**”) by filing a *Complaint For Determination Of Non-Dischargeable Debts Pursuant To 11 U.S.C. § 523(a)(6) and 523(a)(7)* (the “*Complaint*”) [Adv. Docket No. 1].

E. On June 28, 2022, this Court entered an *Order Assigning Matter to Mediation Program and Appointing Mediator and Alternate Mediator* [Adv. Docket No. 13].

## The County's Settlement

F. WHEREAS, the County and the Defendant settled their dispute with respect to this Adversary Proceeding. On February 28, 2023, the Parties filed a *Stipulation By County of Los Angeles, Los Angeles County Department of Public Health acting as the Local*

1 *Enforcement Agency, The People of the State of California, by and through George*  
2 *Gascon, Los Angeles County District Attorney and Andrea Lynn Murray, for Entry of*  
3 *Judgment in favor of Plaintiff County of Los Angeles for Non-Dischargeability of Debts*  
4 *Under 11 U.S.C. §§ 523(a)(6) and 523(a)(7) [Adv. Docket No. 25] (the “**County of Los***  
5 ***Angeles Stipulated Judgment**”).*

6 G. WHEREAS, on March 1, 2023, the Court granted the County’s Stipulated  
7 Judgment [Adv. Docket No. 28].

8 H. WHEREAS, on March 23, 2023, the Court entered the *Judgment* [Adv. Docket No.  
9 30].

10 **The People’s Settlement**

11 I. WHEREAS, the People also settled their dispute with the Defendant with respect to  
12 this Adversary Proceeding. On April 3, 2023, the Parties filed a *Stipulation By County of Los*  
13 *Angeles, Los Angeles County Department of Public Health acting as the Local*  
14 *Enforcement Agency, The People of the State of California, by and through George*  
15 *Gascon, Los Angeles County District Attorney and Andrea Lynn Murray, for Entry of*  
16 *Judgment In Favor of Plaintiff The People of the State of California For Non-*  
17 *Dischargeability Of Debts Under 11 U.S.C. §§ 523(a)(6) and 523(a)(7) (the “**People***  
18 ***Stipulated Judgment**”)* [Adv. Docket No. 34].

19 J. WHEREAS, on April 4, 2023, the Court granted the People Stipulated Judgment.

20 K. WHEREAS, on April 4, 2023, the Court entered the *Judgment* [Adv. Docket No.  
21 38].

22 **The Mediation**

23 L. WHEREAS, On November 30, 2023, the Plaintiff and Defendant participated in  
24 mediation before Mediator, Sandra J. Coleman, Esq. (the “**Mediator**”). The mediation was  
25 unsuccessful but the Parties participated in a continued mediation on July 2, 2024 with the Mediator  
26 and Patrick Flannery (“**Flannery**”) (as set forth below), the co-owner of the Real Property (as  
27

1 defined below) and his counsel. Although the continued mediation did not result in settlement, all  
2 parties agreed to participate in a further continued mediation on July 29, 2024 which was similarly  
3 unsuccessful.

4 M. WHEREAS, on September 19, 2024, the LEA and its counsel, Flannery and its  
5 counsel and Defendant's real estate agent held an informal virtual meeting. Such meeting was  
6 continued to October 10, 2024 but abruptly cancelled by the realtor on the same day.

7 N. WHEREAS, at this juncture, there is no formal continued mediation date set with the  
8 Mediator given the posture of the case but the Parties reserve the right to formally request one (if  
9 needed).

10 **Court Ordered Dates**

11 O. WHEREAS, the Court established a discovery cut-off date of November 1, 2024  
12 [Adv. Docket No. 77] (the "**Discovery Cut-Off Date**").

13 P. WHEREAS, the pre-trial conference is set for November 4, 2024 at 11:00 a.m.  
14 [Adv. Docket No. 77] (the "**Pre-Trial Conference**").

15 **The Flannery Adversary Proceeding**

16 Q. WHEREAS, on February 4, 2022, Flannery filed a *Complaint to Determine*  
17 *Dischargeability of Debt* [11 U.S.C. § 523(a)(6)] (the "**Flannery Complaint**") against Defendant  
18 thereby commencing the "**Flannery Adversary Proceeding**".

19 R. WHEREAS, Flannery and the Defendant are owners of the real property located at  
20 12051 Browns Canyon Rd., Chatsworth, California (the "**Real Property**") that is the subject of the  
21 Plaintiff's Adversary Proceeding. In the Flannery Complaint, Flannery alleges, among other things,  
22 that based upon Defendant's misconduct, the debt owed by Defendant to Flannery is  
23 nondischargeable under Section 523(a)(6) of the Bankruptcy Code.

24 S. WHEREAS, given that the Defendant and Flannery are co-owners of the Real  
25 Property, there is a common nexus of facts or circumstances between the Adversary Proceeding and  
26 the Flannery Adversary Proceeding.

T. On May 7, 2024, the Court entered an Order authorizing, among other things, Flannery to participate in mediation with the Plaintiff and the Defendant [Docket No. 70].

U. On November 4, 2024 at 11:00 a.m., the Court will hear Flannery's *Motion to Vacate/Alter Order Dismissing Adversary Proceeding for Lack of Prosecution* [Docket No. 52].

## **STIPULATION**

NOW THEREFORE, it is hereby stipulated by and between the Parties, as follows:

1. The Plaintiff and the Defendant hereby stipulate to extend the Discovery Cut-Off Date from November 1, 2024 to February 1, 2025; and

2. The Plaintiff and the Defendant hereby stipulate to continue the Pre-Trial Conference from November 4, 2024 to January 13, 2025 at 11:00 a.m. (or to a date and time most convenient for this Court).

Dated: October 17, 2024

RIMON, P.C.

By: 

Jacquelyn H. Choi  
Attorneys for Plaintiffs,  
THE PEOPLE OF THE STATE OF  
CALIFORNIA, by and through GEORGE  
GASCÓN, Los Angeles County District  
Attorney, COUNTY OF LOS ANGELES and  
LOS ANGELES COUNTY DEPARTMENT  
OF PUBLIC HEALTH ACTING AS THE  
LOCAL ENFORCEMENT AGENCY

Dated: October 15, 2024

ANDREA LYNN MURRAY

*Andrea B. Dunn*

~~Andrea Lynn Murray~~  
Andrea Lynn Murray  
Defendant Pro Se

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
30941 Agoura Road, Suite 126, Westlake Village, CA 91361

A true and correct copy of the foregoing document entitled: **THIRD STIPULATION FOR ENTRY OF ORDER (1) EXTENDING DISCOVERY CUT-OFF DATE; AND (2) CONTINUING PRE-TRIAL CONFERENCE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 10/17/24, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

United States Trustee: ustpregion16.wh.ecf@usdoj.gov  
Chapter 7 Trustee: Nancy J. Zamora, zamora3@aol.com, nzamora@ecf.axosfs.com  
Other Parties in Interest: Raymond H. Aver, ray@averlaw.com,  
averlawfirm@gmail.com; ani@averlaw.com; kayta@averlaw.com; jesus@averlaw.com

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On (date) 10/17/24, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Andrea Lynn Murray, and DOES 1-10  
PO Box 3155  
Chatsworth, CA 91313

Sandra J. Coleman, Esq.  
SJ Coleman & Associates  
2700 N Main St Ste 1070  
Santa Ana, CA 92705

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/17/24 Jessica Hawley  
Date Printed Name Jessica Hawley  
Signature